

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE GOOGLE ADVERTISING ANTITRUST
LITIGATION

Case No. 1:21-md-03010 (PKC)

This Document Relates To:

GANNETT CO., INC.

Plaintiff,

-against-

GOOGLE LLC and ALPHABET INC.,

Defendants.

Case No. 1:23-cv-5177 (PKC)

**GANNETT’S FIRST SET OF REQUESTS FOR ADMISSION
TO DEFENDANTS GOOGLE LLC AND ALPHABET INC.**

Pursuant to Federal Rule of Civil Procedure 36 and Pretrial Order No. 5 (ECF 394), Plaintiff in the above-captioned matter Gannett Co., Inc. (“Gannett”), by its counsel, hereby serves this First Set of Requests for Admission (“Requests”) upon Defendants Google LLC and Alphabet Inc. and request that Defendants answer each, under oath, within thirty (30) days.

Please note that the matters set forth herein will be deemed admitted unless within thirty (30) days of service of these Requests, Defendants serve upon Plaintiff’s counsel written answers or objections addressed to the matter and signed by Defendants or their attorneys.

DEFINITIONS

The definitions and rules of construction set forth in Rule 34 of the Federal Rules of Civil Procedure and Rule 26.3 of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York – including, but not limited to, the definitions of “Documents” and “Person” – are hereby incorporated and apply to these Requests. These definitions apply throughout these Requests without regard to capitalization. Plaintiff reserves the right to deliver and serve additional Requests. In addition, as used in these Requests, the words set forth below shall be defined as follows:

1. “You,” “Your,” “Alphabet,” or “Google” shall mean Defendants Google LLC and Alphabet Inc., and their past and present officers, employees, agents and representatives, parents and predecessors, divisions, subsidiaries, affiliates, partnerships and joint ventures. The terms subsidiary, affiliate, and joint venture refer to any firm in which there is total or partial ownership of twenty-five percent or more or total or partial control between the company and any other Person or entity.

2. To bring within the scope of these Requests all information that might otherwise be construed to be outside of their scope, the following rules of construction apply: (i) the singular includes the plural and vice versa; (ii) the masculine, feminine, or neuter pronoun does not exclude other genders; (iii) the connectives “and” and “or” should be read either disjunctively or conjunctively as necessary to bring within the scope of the discovery Request all responses that might otherwise be construed to be outside of its scope; (iv) the terms “any,” “all,” and “each” should be read to mean any and all; (v) the word “including” should be read to mean including, without limitation; (vi) the present tense should be construed to include the past tense and vice versa; (vii) references to employees, officers, directors, or agents include both current

and former employees, officers, directors, and agents; and (viii) defined terms should be given their broadest meaning regardless of whether they are capitalized in these Requests.

INSTRUCTIONS

1. Unless otherwise specified, the information requested by this set of Requests shall include information within the knowledge or possession of any of Your agents, employees, attorneys, investigators, or any other Persons, firms, or entities directly or indirectly subject to Your control in any way whatsoever.

2. Each Request shall be answered in its entirety. If any Request or subsection thereof cannot be answered in full, it shall be answered to the fullest extent possible with an explanation as to why a complete answer is not provided.

3. Separate and complete responses (or, as the case may be, separate objections) are required for each Request or subpart thereof.

4. If a claim of privilege is asserted in objecting to any Request or subpart thereof, and a full response is not provided on the basis of such assertions, You are directed to comply with all applicable rules, statutes and provisions regarding such Requests, including, but not limited to Rule 26(b)(5) of the Federal Rules of Civil Procedure relating to, among other things, the identification, protection, and disclosure of the existence of such information. You are further directed to respond to any part of the Request which is not objectionable and furnish a statement of the claim of privilege and all facts relied upon in support thereof in the form of a log.

5. If You find the meaning of any term in any Request is unclear, without wavier of Plaintiff's right to seek a full and compliant response to the Request, You shall assume a reasonable meaning, state what the assumed meaning is, and respond to the Request according to the assumed meaning.

6. These Requests are continuing in nature and require supplemental or additional responses in accordance with Rule 26(e) of the Federal Rules of Civil Procedure.

REQUESTS FOR ADMISSION

REQUEST FOR ADMISSION NO. 1:

Admit that Google has no basis to dispute the authenticity of the Documents identified by Bates numbers in Exhibit A.

ANSWER:

REQUEST FOR ADMISSION NO. 2:

Admit that each Bates-numbered Document produced by Google and listed in Exhibit A is a true, correct, and authentic copy of a genuine original Document.

ANSWER:

REQUEST FOR ADMISSION NO. 3:

Admit that Google has no basis to dispute the authenticity of the trial transcripts from the *United States v. Google*, No. 1:20-cv-3010 (D.D.C. 2023) action enumerated in Exhibit B.

ANSWER:

REQUEST FOR ADMISSION NO. 4:

Admit that each trial transcript from the *United States v. Google*, No. 1:20-cv-3010 (D.D.C. 2023) action enumerated in Exhibit B is a true, correct, and authentic copy of a genuine original Document.

ANSWER:

Dated: May 14, 2024

Respectfully submitted,

/s/ John Thorne

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EXHIBIT A

Document	Bates Number
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3	GOOG-AT-MDL-000034633
4	GOOG-AT-MDL-000037910
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2757	GOOG-TEX-01267302
2758	GOOG-TEX-01271421
2759	GOOG-TEX-01280212

EXHIBIT B

Exhibit	Trial Transcript Document
B1	Transcript of Bench Trial, Day 3 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Sept. 14, 2023)
B2	Transcript of Bench Trial, Day 5 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Sept. 18, 2023)
B3	Transcript of Bench Trial, Day 6 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Sept. 19, 2023)
B4	Transcript of Bench Trial, Day 7 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Sept. 20, 2023)
B5	Transcript of Bench Trial, Day 7 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Sept. 20, 2023)
B6	Transcript of Bench Trial, Day 8 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Sept. 21, 2023)
B7	Transcript of Bench Trial, Day 8 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Sept. 21, 2023)
B8	Transcript of Bench Trial, Day 9, Transcript For Non-Party Apple Only, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Sept. 22, 2023)
B9	Transcript of Bench Trial, Day 10 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Sept. 26, 2023)
B10	Transcript of Bench Trial, Day 10 Public Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Sept. 26, 2023)
B11	Transcript of Bench Trial, Day 10 Redacted Sealed Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Sept. 26, 2023)
B12	Transcript of Bench Trial, Day 12 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Sept. 28, 2023)
B13	Transcript of Bench Trial, Day 15 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 3, 2023)
B14	Transcript of Bench Trial, Day 16 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 4, 2023)
B15	Transcript of Bench Trial, Day 16 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 4, 2023)
B16	Transcript of Bench Trial, Day 17 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 5, 2023)
B17	Transcript of Bench Trial, Day 18, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 6, 2023)
B18	Transcript of Bench Trial, Day 19 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 10, 2023)
B19	Transcript of Bench Trial, Day 20 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 11, 2023)
B20	Transcript of Bench Trial, Day 20 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 11, 2023)

Exhibit	Trial Transcript Document
B21	Transcript of Bench Trial, Day 21 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 12, 2023)
B22	Transcript of Bench Trial, Day 22 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 16, 2023)
B23	Transcript of Bench Trial, Day 23 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 17, 2023)
B24	Transcript of Bench Trial, Day 23 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 17, 2023)
B25	Transcript of Bench Trial, Day 24 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 18, 2023)
B26	Transcript of Bench Trial, Day 24 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 18, 2023)
B27	Transcript of Bench Trial, Day 25 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 19, 2023)
B28	Transcript of Bench Trial, Day 26 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 24, 2023)
B29	Transcript of Bench Trial, Day 27 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 25, 2023)
B30	Transcript of Bench Trial, Day 28 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 26, 2023)
B31	Transcript of Bench Trial, Day 30 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 30, 2023)
B32	Transcript of Bench Trial, Day 31 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Oct. 31, 2023)
B33	Transcript of Bench Trial, Day 33 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Nov. 2, 2023)
B34	Transcript of Bench Trial, Day 34, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Nov. 3, 2023)
B35	Transcript of Bench Trial, Day 35 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Nov. 6, 2023)
B36	Transcript of Bench Trial, Day 36 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Nov. 7, 2023)
B37	Transcript of Bench Trial, Day 37 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Nov. 8, 2023)
B38	Transcript of Bench Trial, Day 37 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Nov. 8, 2023)
B39	Transcript of Bench Trial, Day 38, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Nov. 9, 2023)
B40	Transcript of Bench Trial, Day 39 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Nov. 13, 2023)
B41	Transcript of Bench Trial, Day 40 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Nov. 14, 2023)

Exhibit	Trial Transcript Document
B42	Transcript of Bench Trial, Day 40 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Nov. 14, 2023)
B43	Transcript of Bench Trial, Day 41 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Nov. 15, 2023)
B44	Transcript of Bench Trial, Day 41 Afternoon Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Nov. 15, 2023)
B45	Transcript of Bench Trial, Day 42 Morning Session, <i>United States v. Google</i> , No. 1:20-cv-3010 (D.D.C. Nov. 16, 2023)